

January 31, 2025

MEMO ENDORSED

BY ECF AND EMAIL

The Honorable Katherine Polk Failla
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: In re Tether and Bitfinex Crypto Asset Litigation, No. 19 Civ. 9236 (S.D.N.Y.) (KPF)

Dear Judge Failla:

We write on behalf of the parties regarding redactions to the briefing on Plaintiffs' motion for class certification. (Dkt. No. 585.)

Plaintiffs filed under seal their motion for class certification and supporting documents, as well as amended versions of certain supporting documents, on January 10 and January 22, 2025 and sought leave to file on January 31, 2025 unsealed copies subject to redactions proposed by Defendants and to comply with the Court's prior orders safeguarding the Anonymous Trader's confidentiality. (Dkt. Nos. 584, 591.)

The parties have conferred and respectfully seek the Court's leave to maintain under seal Plaintiffs' motion and supporting documents (Dkt. Nos. 586-87, 592) as well as the remainder of the parties' briefs and supporting material that have yet to be filed until a reasonable time after briefing is completed. Plaintiffs' motion and supporting documents are lengthy and contain information relating to the Anonymous Trader as well as certain information designated Attorneys' Eyes Only and Confidential by Defendants and Defendants anticipate that their opposition and expert reports will reference and cite Plaintiffs' filings as well as documents produced by Plaintiffs. For the sake of efficiency, and to facilitate a streamlined review process for the Court, the parties respectfully request that they be permitted to confer regarding redactions to their briefs and supporting documents after the submission of all such materials and to file proposed redactions no later than three weeks following the submission of all such materials.

Respectfully submitted,

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Application GRANTED. The parties' briefing, including Plaintiffs' motion for class certification (Dkt. #586-87, 592), will remain under seal, viewable to the Court and the parties only. The parties are instructed to submit all proposed redactions on or before **July 8, 2025**.

The Clerk of Court is directed to terminate the pending motion at docket entry 594.

Dated: February 3, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE